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September 3, 2008

Public Utilities Commission of Ohio
PUCO Docketing
180 East Broad Street, 13th Floor
Columbus, Ohio 43215

In Re: Case No. 08-0935-EL-SSO
Case No. 08-0936-EL-SSO

Greetings:

Please find an original and ten copies of the Motion to Intervene by Material Sciences Corporation in the above referenced proceedings for filing on September 4, 2008.

Regards



Craig I. Smith
Attorney for Material Sciences Corporation

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the
Ohio Edison Company, The Cleveland
Electric Illuminating Company, and The
Toledo Edison Company, for Authority to Case No. 08-0935-EL-SSO
Establish a Standard Service Offer
Pursuant to R.C. § 4928.143 in the Form
of an Electric Security Plan

In the Matter of the Application of Ohio
Edison Company, The Cleveland Electric
Illuminating Company and The Toledo
Edison Company for Approval of a Case No. 08-0936-EL-SSO
Market Rate Offer to Conduct a
Competitive Bidding Process for Standard
Service Offer Electric Generation Supply,
Accounting Modifications Associated
with Reconciliation Mechanism, and
Tariffs for Generation Service.

**MOTION FOR LEAVE TO INTERVENE BY
MATERIAL SCIENCES CORPORATION**

Pursuant to ORC 4903.221, and Rule 4901-1-11 of the Ohio Administrative Code,
Material Sciences Corporation moves the Public Utilities Commission of Ohio
("Commission") for leave to intervene in these proceedings as a full party of record.
Material Sciences Corporation's ("MSC") intervention should be granted because it has a
real and substantial interest that is not represented by an existing party; its participation
will not cause undue delay, will not unjustly prejudice any existing party, and will
contribute to the just and expeditious resolution of issues raised in these proceedings.

The Memorandum In Support of this motion is incorporated herein by reference.

Wherefore, MSC respectfully requests a Commission order granting intervention.

Respectfully submitted,



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Attorney for Materials Science Corporation

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the
Ohio Edison Company, The Cleveland
Electric Illuminating Company, and The
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Establish a Standard Service Offer
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Edison Company, The Cleveland Electric
Illuminating Company and The Toledo Case No. 08-0936-EL-SSO
Edison Company for Approval of a
Market Rate Offer to Conduct a
Competitive Bidding Process for Standard
Service Offer Electric Generation Supply,
Accounting Modifications Associated
with Reconciliation Mechanism, and
Tariffs for Generation Service.

**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE BY
MATERIAL SCIENCE CORPORATION**

Pursuant to ORC 4903.221, and Rule 4901-1-11 of the Ohio Administrative Code, Material Science Corporation ("MSC") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in these proceedings as a full party of record. The primary business of MSC's Walbridge Coatings in Walbridge, Ohio is electro galvanizing or zinc-nickel plating of steel coils, laminating of steel coils, and painting of steel coils. The MSC Walbridge facility incurs more than \$3.8 million annually in electric costs for service from the Toledo Edison Company ("TE"). Electric costs at that facility have increased by 30% after TE terminated special contract rates in February

2008. TE since then provides service under its PV-45 and Market Based Tariff tariffs to the MSC Walbridge facility.


TE's Standard Service Offer ("SSO") and other features of its Electric Security Plan ("ESP") proposed in this proceeding directly affect the costs and service characteristics of electric purchases by MSC for its Walbridge facility. In particular, generation costs are affected whether MSC buys SSO from TE, or from competitive suppliers, because of TE accounting deferrals, and the avoidable or non-avoidable type of rider charges provided under the ESP. Further, the proposed ESP affects MSC's opportunities to enter in special contracts to lower its electric costs for its Walbridge facility as approved by the Commission. Finally, the proposed Market Rate Offer would likewise directly affect the costs and service characteristics of electricity purchased for MSC's Walbridge facility.

RC 4903.221 and OAC Rule 4901-1-11 set standards for intervention in Commission proceedings. MSC has a real and substantial interest that is not represented by an existing party. Intervention is necessary for MSC to protect those real and substantial interests. MSC's participation will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of issues raised in these proceedings.

MSC, with a real and substantial interest in these proceedings, timely files to intervene pursuant to the Entry dated August 5, 2008 and August 7, 2008, and is otherwise entitled to intervention under ORC 4903.221, and OAC 4901-1-11.

Wherefore, MSC requests that the Commission, its legal director, the deputy legal director, or the attorney examiner assigned to these matters, grant intervention in these proceedings as a full party of record.


Respectfully Submitted,


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing documents was served this 4th day of September 2008 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.


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